

Eric H. Gibbs (State Bar No. 178658)
Amy M. Zeman (State Bar No. 273100)
GIBBS LAW GROUP LLP
505 14th Street, Suite 1110
Oakland, CA 94612
Tel: (510) 350-9700
Fax: (510) 350-9701
ehg@classlawgroup.com
amz@classlawgroup.com

Dena C. Sharp (State Bar No. 245869)
Adam E. Polk (State Bar No. 273000)
Nina R. Gliozzo (State Bar No. 333569)
GIRARD SHARP LLP
601 California Street, Suite 1400
San Francisco, CA 94108
Tel: (415) 981-4800
Fax: (415) 981-4846
dsharp@girardsharp.com
apolk@girardsharp.com
ngliozzo@girardsharp.com

Adam B. Wolf (State Bar No. 215914)
Tracey B. Cowan (State Bar No. 250053)
**PEIFFER WOLF CARR KANE &
CONWAY, APLC**
4 Embarcadero Center, Suite 1400
San Francisco, CA 94111
Tel: (415) 766-3545
Fax: (415) 402-0058
awolf@peifferwolf.com
tcowan@peifferwolf.com

Plaintiffs' Counsel

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE PACIFIC FERTILITY CENTER
LITIGATION

This Document Relates to:
Case No. 3:18-cv-01586-JSC
(A.B., C.D., E.F., G.H., and I.J.)

Case No. 3:18-cv-01586-JSC

**STIPULATION AND ~~PROPOSED~~
ORDER REGARDING OPPOSITION
MEMORANDUM PAGE LIMITS AND
ADDITIONAL MOTIONS IN LIMINE**

Judge: Hon. Jacqueline Scott Corley

Pursuant to Local Rule 7-12, Plaintiffs and Defendant Chart Inc., by and through their respective counsel, respectfully submit this Stipulation and [Proposed] Order Enlarging the Page Limit for Plaintiffs' Opposition to Chart's Motion in Limine No. 1: Other Occurrence Evidence and allowing Plaintiffs to bring two additional motions in limine regarding evidentiary issues.

WHEREAS, on April 2, 2021, Plaintiffs and Chart exchanged their respective motions in limine and then discussed on April 7, 2021 the total number each proposes to file;

WHEREAS, pursuant to the Court's Pretrial Order No. 1, each party is limited to bringing five motions in limine (Dkt. No. 206);

WHEREAS, at the Case Management Conference held March 24, 2021, the Court stated that the Pretrial Order limiting each side to five motions in limine only applies to evidentiary, not procedural, issues;

WHEREAS, Chart's Motion in Limine No. 1: Other Occurrence Evidence includes 19 pages of briefing;

WHEREAS, Plaintiffs may require additional pages to fully oppose Chart's Motion in Limine No. 1: Other Occurrence Evidence and propose to submit an opposition brief of up to 10 pages, to which Defendant has agreed;

WHEREAS, Plaintiffs propose filing two motions in limine regarding procedural issues and Defendant has agreed to Plaintiffs' proposal;

WHEREAS, Plaintiffs propose filing seven motions in limine regarding evidentiary issues and Defendant has agreed to Plaintiffs' proposal;

NOW, THEREFORE, the parties, through their respective counsel, hereby stipulate that Plaintiffs be permitted to submit a 10-page opposition to Chart's Motion in Limine No. 1: Other Occurrence Evidence and be permitted to file seven motions in limine regarding evidentiary issues.

IT IS SO STIPULATED.

Dated: April 9, 2021

By: /s/ Amy M. Zeman
Eric H. Gibbs (State Bar No. 178658)
Amy M. Zeman (State Bar No. 273100)
GIBBS LAW GROUP LLP
505 14th Street, Suite 1110
Oakland, CA 94612

Tel: (510) 350-9700
Fax: (510) 350-9701
ehg@classlawgroup.com
amz@classlawgroup.com

Dena C. Sharp (State Bar No. 245869)
Adam E. Polk (State Bar No. 273000)
Nina R. Gliozzo (State Bar No. 333569)
GIRARD SHARP LLP
601 California Street, Suite 1400
San Francisco, CA 94108
Tel: (415) 981-4800
Fax: (415) 981-4846
dsharp@girardsharp.com
apolk@girardsharp.com
ngliozzo@girardsharp.com

Adam B. Wolf (State Bar No. 215914)
Tracey B. Cowan (State Bar No. 250053)
**PEIFFER WOLF CARR KANE &
CONWAY, APLC**
4 Embarcadero Center, Suite 1400
San Francisco, CA 94111
Tel: (415) 766-3545
Fax: (415) 402-0058
awolf@peifferwolf.com
tcowan@peifferwolf.com

Plaintiff's Counsel

Dated: April 9, 2021

By: /s/ Kevin M. Ringel
John J. Duffy (SB No. 6224834)
Kevin M. Ringel (SB No. 6308106)
SWANSON, MARTIN & BELL, LLP
330 N Wabash, Suite 3300
Chicago, Illinois 60611
Tel: (312) 321-9100
Fax: (312) 321-0990
jduffy@smbtrials.com
kringel@smbtrials.com

Marc G. Cowden (SB No. 169391)
Adam Stoddard (SB No. 272691)
**SHEUERMAN, MARTINI, TABARI,
SENERE & GARVIN**
1033 Willow Street
San Jose, California 95125
Tel: (408) 288-9700

Fax: (408) 295-9900
mcowden@smtlaw.com
astoddard@smtlaw.com

Counsel for Defendant Chart Inc.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: April 12, 2021


Hon. Jacqueline S. Corley
UNITED STATES MAGISTRATE JUDGE